

EXHIBIT 15

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

AXLE OF DEARBORN, INC., D.B.A.
DETROIT AXLE, a Michigan corporation;
DETROIT AXLE, INC., a Michigan corporation;
and **DETROIT AXLE QSSS, INC.**, a Michigan
corporation,

Case No. 21-cv-10163
Hon. Stephanie Dawkins Davis

Plaintiffs,

v.

DETROIT IT, LLC, a Michigan limited
liability company and **ERIC GRUNDLEHNER**,
an individual,

Defendants.

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**PLAINTIFFS' EMERGENCY MOTION FOR ENTRY OF A TEMPORARY
RESTRAINING ORDER AND PRELIMINARY INJUNCTION**

EXHIBIT J- Declaration of Andrew Bartnowak

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DETROIT AXLE, INC., a Michigan corporation;
and **DETROIT AXLE QSSS, INC.**, a Michigan
corporation,

Case No. 21-cv-10163
Hon. Stéphanie Dawkins Davis

Plaintiffs,

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DETROIT IT, LLC, a Michigan limited
liability company and **ERIC GRUNDLEHNER**,
an individual,

Defendants.

DECLARATION OF ANDREW BARTNOWAK

I, Andrew Bartnowak, of full age, if sworn as a witness, would testify as follows:

1. I have personal knowledge of the matters stated in this declaration.
2. I declare, and if called to testify, I would do so as follows:
3. I am currently the President of AG Advisors Global, LLC, a risk mitigation and investigative consultant company. Prior to that I spent twenty-two years in the Detroit Field Office as a Special Agent, and later as a Supervisory Special Agent for the Federal Bureau of Investigation. Most of my career consisted

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of investigations involving violations of federal statutes pertaining to violent crime, money laundering, narcotics and other criminal conduct.

4. I have reviewed Axle of Dearborn, Inc. d.b.a. Detroit Axle; Detroit Axle, Inc.; and Detroit Axle QSSS, Inc.'s (collectively, "Detroit Axle") Verified Complaint, Emergency Motion for Entry of a Temporary Restraining Order to Maintain the Status Quo and to Show Cause Why a Preliminary Injunction Should Not Be Entered, and Supplement to Detroit Axle's Motion that were filed in the Oakland County Circuit Court, and Detroit Axle's Motion for Temporary Restraining Order and Preliminary Injunction, which was filed in the Eastern District of Michigan (collectively, the "Filings").

5. Based upon my expertise, I believe that Detroit IT, LLC ("Detroit IT") and Eric Grundlehner ("Grundlehner") are engaged in unethical business practices and conduct which likely violate a number of civil and criminal laws.

6. I am personally aware of the ongoing damage that Defendants are causing to Detroit Axle by holding Detroit Axle's entire IT infrastructure hostage.

7. Defendants' actions have caused significant damage to Detroit Axle by disrupting Detroit Axle's operations which has significantly interfered with Detroit Axle's ability to service its customers, including first responders.

8. Based upon my investigation to date, it is clear that Defendants' conduct is having far reaching negative implications for Detroit Axle, and is causing

irreparable harm to Detroit Axle. Defendants' conduct is preventing Detroit Axle from hiring new employees, on-boarding employees, servicing its customers, and has made it extremely difficult for Detroit Axle to provide its goods and services to its customers, as Defendants have severely damaged Detroit Axle's logistical system.

9. Defendants' conduct is one of the most blatant and worst examples of behavior which implicates violations of both civil and criminal law that I have experienced in my career.

Dated: January 26, 2021


ANDREW BARTNOWAK